

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

MORINVILLE,)	
)	
Plaintiff,)	
)	Case No. 20-cv-00980-ALM-KPJ
v.)	
)	
OVERWATCH DIGITAL HEALTH, INC.)	
ET. AL,)	
)	
Defendants.)	
)	

UNOPPOSED MOTION OF CLIVE BARRETT, EMMANUEL CORREIA, RISION LIMITED, AND BIOEYE LTD FOR ENTRY OF PROTECTIVE ORDER

Clive Barrett, Emmanuel Correia, and Rision Limited (collectively the “Joint Defendants”) and BioEye Ltd. (“BioEye”), by and through their undersigned counsel, file this motion (the “Motion”) for entry of a protective order, substantially in the form annexed hereto (the “Proposed Order”). In support of the Motion, the Defendants respectfully state as follows:

1. Discovery in this action may involve the disclosure of confidential and proprietary business, technical, and financial information. As a result, BioEye and the Joint Defendants request that the Court enter the Proposed Order to protect against the disclosure of any such information and to ensure that such information will be used only for the purposes of this action.
2. The Proposed Order is based on this Court’s form protective order. BioEye and the Joint Defendants believe that such order will adequately protect the parties’ confidential information.
3. At the Rule 26(f) conference among the parties, counsel for BioEye and the Joint Defendants raised the need for a protective order. The Plaintiff and counsel for Overwatch Digital Health, Inc. do not oppose the entry of the Proposed Order.

WHEREFORE, BioEye and the Joint Defendants request that the Court enter a protective order substantially in the form of the Proposed Order.

Dated: April 28, 2021

PARKINS LEE & RUBIO LLP

/s/R. J. Shannon

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-and-

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CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2021, the forgoing document was served on the following parties (a) through the Court's CM/ECF System if registered to receive such service and (b) by U.S.P.S. first class mail, postage prepaid and email on the following parties:

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/s/R. J. Shannon _____